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April 5, 2017

VIA ECF

The Honorable Edgardo Ramos United States District Court, Southern of New York 40 Foley Square New York, NY 10007

Re: John Macias v. Barrier Free Living, Inc. (Civil Action No. 16-cv-01735-ER)

Dear Judge Ramos:

We represent defendant Barrier Free Living, Inc. in the above-referenced matter. On behalf of all parties, we write to request an adjournment of the Case Management Conference presently scheduled for April 13, 2017 at 10:30 a.m. The parties currently have a pre-motion conference with the Court scheduled for April 27, 2017 at 11:00 a.m., to discuss defendant's anticipated motion for summary judgment. For purposes of convenience and efficiency, the parties jointly request that the April 13 and April 27 conferences be combined into a single conference to be held on April 27, 2017. This is the first request for an adjournment of the case management conference, which will not affect any other dates in the current case management plan.

Thank you for your attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

Daniel Turinsky

cc: John C. Luke, Jr., Esq., Attorney for Plaintiff (via ECF)